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Subject: LWG's RD 2B Archived Core FSP
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Chip & Eric,

Here are DEQ's comments on the LWG's 7/28/06 "*RD 2B FSP Addendum for Analysis of Archived Sediment Samples*".

General Comments

None

Specific Comments

1) "Widespread ("nonelevated") concentrations, Footnote 3- The referenced footnote states that relatively low detected concentrations of metals & PAHs "represent widespread ("nonelevated") concentrations" occurring thruout the study area. What are these concentrations?

2) TPH, Section 2.1.2, Page 3- The referenced text states that 10 chemicals were used by EPA to identify the seven preliminary AOPCs in which a RD 2B is located. In their 12/05 Data Gaps Letter, EPA stated that supplemental TPH analyses may be required at the Gunderson AOPC. TPH may play a larger role in controlling & predicting toxicity thruout Portland Harbor than 1st expected. Archived core segments proposed for analyses from all 7 AOPCs should be submitted for TPH analyses. The TPH data can be used to supplement our understanding of the lateral & vertical distribution of TPH in Portland Harbor.

3) Assumed concentration, Section 2.1.2, Page 4- The 2nd general decision guideline of the referenced text states that if an archived core segment falls within the middle of the core, these vertical data gaps were generally not targeted for analysis. What concentration does the LWG propose that middle segment to contain? An average of the upper & lower segments?

4) Selected archived core samples in Table 4-1, Section 4.0, Page 7- The referenced text states that Table 4-1 lists the selected archived core samples & the chemical analyses proposed for each sample. Table 4-1 lists the analytes, sample preparation & quantitative analysis, but not the selected archived core samples.

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